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JUN 14 2010

Serial No. 10/551,468
Docket No. 2582LN.eh

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AMENDMENTS TO THE DRAWINGS:

Submitted herewith is a Replacement Drawing Sheet for Figure 2. Please replace the originally filed drawing sheet for Figure 2 of the Replacement Drawing Sheet.

Applicant notes that this Replacement Drawing Sheet is filed in order to address the Examiner's objection that the drawing do not identify the pulley 17 which is described in the specification.

No new matter has been added.

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REMARKS

Entry of this Amendment is proper because it narrows the issues on appeal and does not require further searching by the Examiner.

Claims 1, 4-9, 11, 19-20 and 22-28 are all the claims presently pending in the application. Claims 1, 4, 20, 22 and 28 have been amended.

It is noted that the claim amendments are made only for more particularly pointing out the invention, and not for distinguishing the invention over the prior art, narrowing the claims or for any statutory requirements of patentability. Further, Applicant specifically states that no amendment to any claim herein should be construed as a disclaimer of any interest in or right to an equivalent of any element or feature of the amended claim.

Claim 28 stands rejected under 35 USC 112, first paragraph as allegedly failing to comply with the written description requirement, and under 35 USC 112, second paragraph as being allegedly indefinite. These rejection deal with the limitation "*wherein said driving belt comprises plural driving belts, and said drive pulley comprises plural drive pulleys*".

However, Applicant would point out to the Examiner that it is very common and acceptable to recite in a claim "wherein x comprises a plurality of x". Indeed, Applicant would remind the Examiner that the term "a driving belt", for example, should be construed to mean "one or more driving belts". Thus, claim 28 narrows the term "a driving belt" in claim 1 by reciting "a plurality of driving belts". That is, claim 28 clearly complies with 35 USC 112, first and second paragraph, and the Examiner is respectfully requested to withdraw this rejection.

Claims 1, 5, 11, 19, 20 and 25-27 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Shaw (U. S. Pat. 3,074,605) in view of Smith (U. S. Pat. No. 3,322,291) and Takahashi et al. (U. S. Pat. 4,946,528).

Claims 4, 6-8, 22-24 and 28 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Shaw, Smith and Takahashi in view of Magnusson et al. (U. S. Patent No. 3,664,531).

Claim 9 stands rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Shaw, Smith and Takahashi, and further in view of Roberts et al. (U. S. Pat. No. 6,231,711).

These rejections are respectfully traversed in view of the following discussion.

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I. THE CLAIMED INVENTION

An exemplary aspect of the claimed invention (e.g., as defined by claim 1) is directed to an apparatus for laying a material sheet on a plurality of cylindrical bodies including first and second cylindrical bodies, including a unit for applying a material web to the cylindrical bodies, and a conveyor disposed to advance the cylindrical bodies in a longitudinal direction thereof, to, past and away from the unit. The conveyor includes a first section including a plurality of wheels for rotating and advancing the cylindrical bodies, the first section being disposed to displace the cylindrical bodies in their longitudinal direction and connect the first cylindrical body of the plurality of cylindrical bodies with an end of the second cylindrical body of the plurality of cylindrical bodies which precedes the first cylindrical body, and a second section including a plurality of wheels for rotating and advancing the cylindrical bodies, the second section being connected to the first section and operating independent of the first section, and being disposed to positively rotate the cylindrical bodies about their longitudinal axis and displace the cylindrical bodies in the direction of their longitudinal axis during the applying of the material web, with a desired spacing between edges of the applied material web.

Importantly, the conveyor also includes a first plurality of drive pulleys formed on a first side of the first and second sections and a second plurality of drive pulleys formed on a second side of the first and second sections, the plurality of wheels of the first and second sections including a first plurality of wheels formed on the first side and being rotated by a first driving belt formed around the first plurality of drive pulleys, and a second plurality of wheels formed on the second side and being rotated by a second driving belt formed around the second plurality of drive pulleys (Application Figure 1; page 6, lines 2-31). The first and second plurality of wheels are disposed on a side of the bodies, the wheels being obliquely inclinable in relation to the longitudinal axis of the bodies for rotation and driving thereof towards, past and away from the unit for applying the material web. This may allow the claimed invention to allow a very accurate control of the cylindrical bodies which may be important for keeping a desired distance between the edges of the sheet.

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II. THE ALLEGED PRIOR ART REFERENCES

A. Shaw, Smith and Takahashi

The Examiner alleges that Shaw would have been combined with Smith and Takahashi to form the invention of claims 1, 5, 11, 19, 20 and 25-27. Applicant submits, however, that these alleged references would not have been combined and even if combined, the combination would not teach or suggest each and every feature of the claimed invention.

In particular, Applicant submits that these alleged references are completely unrelated, and no person of ordinary skill in the art would have considered combining these disparate references, absent impermissible hindsight. Therefore, Applicant respectfully submits that these disparate references would not have been combined by one of ordinary skill in the art.

Moreover, neither Shaw, nor Smith, nor Takahashi teach or suggest "*a first plurality of drive pulleys formed on a first side of the first and second sections and a second plurality of drive pulleys formed on a second side of the first and second sections, the plurality of wheels of said first and second sections comprising: a first plurality of wheels formed on the first side and being rotated by a first driving belt formed around the first plurality of drive pulleys; and a second plurality of wheels formed on the second side and being rotated by a second driving belt formed around the second plurality of drive pulleys*", as recited in claim 1 (Application Figure 1; page 6, lines 2-31). As noted above, this may allow the claimed invention to allow a very accurate control of the cylindrical bodies which may be important for keeping a desired distance between the edges of the sheet.

Clearly, these features are not taught or suggested by the cited references. Indeed, Applicant would first point out that Shaw does not teach or suggest two sections (e.g., having wheels which are adjustable in an angle and rpm). Indeed, all of the wheels 10, 12 and 14 are connected to each other via the shafts 24.

In addition, in the first section of Smith, the pipe is moved linearly by the rollers 204. However, the rollers 63 are not driving the pipe but support the pipe.

Further, Takahashi, does not teach or suggest any pairs of wheels (e.g., adjustable in different angles and rpm) and arranged in two sections. The wheels 124 and 174 are used to press the sheet 104 on the tube 102 and not the pipe on the drive rolls 220.

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Roberts does not teach or suggest these novel features.

That is, clearly these references do not teach or suggest the first and second plurality of wheels as in the claimed invention, and certainly do not teach or suggest a first plurality of drive pulleys formed on a first side of the first and second sections and a second plurality of drive pulleys formed on a second side of the first and second sections, the plurality of wheels of the first and second sections including a first plurality of wheels formed on the first side and being rotated by a first driving belt formed around the first plurality of drive pulleys, and a second plurality of wheels formed on the second side and being rotated by a second driving belt formed around the second plurality of drive pulleys, as in the claimed invention.

Indeed, the Examiner essentially concedes that these references do not teach or suggest this feature on pages 6 and 7 of the Office Action.

B. Magnusson and Roberts

The Examiner alleges that Shaw, Smith and Takahashi would have been further combined with Magnusson to form the invention of claims 4, 6-8, 22-24 and 28, and with Roberts to form the invention of claim 9. Applicant submits, however, that these alleged references would not have been combined and even if combined, the combination would not teach or suggest each and every feature of the claimed invention.

In particular, Applicant submits that these alleged references are completely unrelated, and no person of ordinary skill in the art would have considered combining these disparate references, absent impermissible hindsight. Therefore, Applicant respectfully submits that these disparate references would not have been combined by one of ordinary skill in the art.

Moreover, neither Shaw, nor Smith, nor Takahashi, nor Magnusson, nor Roberts, nor any alleged combination thereof teach or suggest *"a first plurality of drive pulleys formed on a first side of the first and second sections and a second plurality of drive pulleys formed on a second side of the first and second sections, the plurality of wheels of said first and second sections comprising: a first plurality of wheels formed on the first side and being rotated by a first driving belt formed around the first plurality of drive pulleys; and a second plurality of wheels formed on the second side and being rotated by a second driving belt formed around the second plurality of drive pulleys"*, as recited in claim 1 (Application Figure 1; page 6, lines 2-31). As noted above, this may allow the claimed invention to allow a very accurate

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control of the cylindrical bodies which may be important for keeping a desired distance between the edges of the sheet.

Clearly, Magnusson does not teach or suggest these features.

In fact, Magnusson simply discloses a device for imparting a rotational and longitudinal movement to tubes. The device includes a shaft 3, pulleys or rollers 6, and pulley belt 4 (Magnusson at col. 1, lines 33-56). However, nowhere does Magnusson teach or suggest a first plurality of drive pulleys formed on a first side of the first and second sections and a second plurality of drive pulleys formed on a second side of the first and second sections, the plurality of wheels of the first and second sections including a first plurality of wheels formed on the first side and being rotated by a first driving belt formed around the first plurality of drive pulleys, and a second plurality of wheels formed on the second side and being rotated by a second driving belt formed around the second plurality of drive pulleys, as in the claimed invention.

Likewise, Roberts does not teach or suggest these features.

Indeed, Roberts simply discloses an apparatus for making paint roller covers. In particular, the Examiner attempts to rely on Figure 6 to support his position. However, nowhere in Figure 6 or anywhere else does Roberts teach or suggest a first plurality of drive pulleys formed on a first side of the first and second sections and a second plurality of drive pulleys formed on a second side of the first and second sections, the plurality of wheels of the first and second sections including a first plurality of wheels formed on the first side and being rotated by a first driving belt formed around the first plurality of drive pulleys, and a second plurality of wheels formed on the second side and being rotated by a second driving belt formed around the second plurality of drive pulleys, as in the claimed invention.

Therefore, neither Magnusson nor Roberts makes up for the deficiencies in Shaw, Smith and Takahashi.

Therefore, Applicant would submit that these alleged references would not have been combined and even if combined, the combination would not teach or suggest each and every feature of the claimed invention. Therefore, the Examiner is respectfully requested to withdraw this rejection.

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III. FORMAL MATTERS AND CONCLUSION

Applicant notes that Figure 2 has been amended to address the Examiner's objection to the drawings.

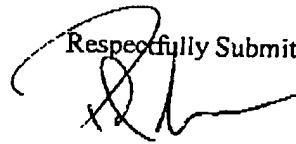
The Examiner objects to claim 25 as allegedly failing to further the subject matter of a previous claim stating that the claim "contains limitations that are specific only (sic) the material to be worked upon by the claimed invention". This is incorrect. In fact, claim 25 recites "*wherein ... the end of the second cylindrical body comprises a second bevelled end which is bevelled in a direction opposite to a direction of the first bevelled end and is connected by the apparatus to the first bevelled end*". That is the claim clearly further limits claim 1 by reciting that the apparatus connects the second bevelled end to the first bevelled end. Clearly, claim 1 is not limited in this respect. In view of the foregoing, the Examiner is respectfully requested to withdraw this objection.

In view of the foregoing, Applicant submits that claims 1, 4-9, 11, 19-20 and 22-28, all the claims presently pending in the application, are patentably distinct over the prior art of record and are in condition for allowance. The Examiner is respectfully requested to pass the above application to issue at the earliest possible time.

Should the Examiner find the application to be other than in condition for allowance, the Examiner is requested to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary in a telephonic or personal interview.

The Commissioner is hereby authorized to charge any deficiency in fees or to credit any overpayment in fees to Attorney's Deposit Account No. 50-0481.

Respectfully Submitted,



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Date: June 14, 2010

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